

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Leontyne Kelly Jones, Debtor**

**Case No. 25-00124-JAW  
CHAPTER 13**

**MOTION TO INCUR NEW DEBT**

COMES NOW, Debtor, by and through counsel, and moves this Court to allow Debtor to incur new debt, and in support thereof, would show the Court as follows:

1. Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code on 01/15/2025.
2. Debtor is paying approximately 100% to General Unsecured Debts through the plan.
3. Debtor plans to attend Holmes Community College to continue her education to obtain a Licensed Practical Nurse (LPN) degree. She intends to enroll in the Fall 2024, Winter 2025, and Summer 2025 semesters.
4. Debtor is currently employed as a lab technician, earning approximately \$40,000 per year. By obtaining a LPN degree, she could potentially increase her annual income to around \$70,000.
5. Debtor seeks to obtain financial aid in the amount of \$6,000.00, to be disbursed in approximately \$2,000.00 increments per semester to complete her nursing degree.
6. Debtor will repay this debt directly to the lender in accordance with the terms of their agreement.

WHEREFORE, Debtor prays for an Order granting the above requested relief and any additional relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr. (MS Bar No. 103469)  
The Rollins Law Firm, PLLC  
P.O. Box 13767  
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601-500-5533

**CERTIFICATE OF SERVICE**

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the foregoing was forwarded on July 11, 2025, to the creditor, case trustee and U.S. Trustee as indicated in the “21-day notice” that accompanies this Motion.

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2025, I electronically filed the foregoing with the Clerk of the Court for the United States Bankruptcy Court for the SOUTHERN DISTRICT OF MISSISSIPPI by using the CM/ECF system. I certify that the U.S. Trustee and Trustee appointed to this case are registered CM/ECF users and that service to these individuals will be accomplished by the CM/ECF system.

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.